

EXHIBIT 66

In the Matter Of:

HENRY v

BROWN UNIVERSITY

JASON LOCKE

December 11, 2023



1 Q. And it says, "Her file
2 includes a 'Cornell Connection Review'
3 form which lets anyone know who reviews
4 the folder know that she was a 'tracked
5 VIP' for the university."

6 A. Yes.

7 Q. And you say, "It is my
8 understanding that the Development list
9 is quite big."

10 A. Yes.

11 Q. So what is the Cornell
12 Connection Review?

13 A. So the Cornell Connection
14 Review form was -- at one point in time,
15 it was a form that was included in the
16 admissions file for individual students.
17 The most important aspect of the Cornell
18 Connection form was that Heather was
19 confirming that a student was indeed a
20 legacy candidate.

21 And what I mean by that is
22 Heather and her office took
23 responsibility for confirming any --
24 anytime a student listed on their

1 application that they were a legacy
2 candidate.

3 So on the Common Application
4 at the time, as I recall, students were
5 asked about any family connections to the
6 institution. Heather's office was
7 responsible for confirming that.

8 So that's -- that's,
9 essentially, what the Cornell Connection
10 form was.

11 Q. Is -- is there a difference
12 between a legacy applicant and a VIP
13 applicant?

14 A. I would say yes. We had 2
15 to 3,000 legacy applicants in a given
16 year, and, you know, not every one of
17 those students would be admitted or
18 enroll at the institution.

19 Yeah, I would say there was
20 probably a difference, significant
21 difference.

22 Q. So what makes somebody a VIP
23 applicant?

24 A. When it came to the

180

1 connection form, at the bottom there
2 would be people listed if they were being
3 kind of tracked by someone in
4 advancement. And that was kind of how
5 you would know that someone was being,
6 you know, tracked for some reason within
7 the -- the larger advancement office.

8 Q. Would that reason be that
9 their family were Cornell donors?

10 A. It could be.

11 MR. ARMSTRONG: Objection.
12 Form.

13 BY MR. DELICH:

14 Q. Were there any changes to
15 this process during your tenure as
16 associate vice provost?

17 MR. ARMSTRONG: Objection.
18 Vague.

19 THE WITNESS: Yeah, I don't
20 recall.

21 BY MR. DELICH:

22 Q. And you said the reviewers
23 for -- people reviewing for admissions
24 would have had access to the Cornell

1 Generally, it meant that
2 they were in some way, you know,
3 admissible to the institution, but we
4 needed, you know, to see a year of
5 coursework under their belt and they
6 needed to meet some conditions in order
7 to apply and be admitted as a transfer
8 student.

9 Q. And then you see in the
10 comments for this first entry, it says,
11 "Grandparents" -- redaction -- "very
12 generous major gifts donors"?

13 A. Yes.

14 Q. Does this reflect -- you're
15 going to have to remind me of the exact
16 phrase.

17 Was it the review form or in
18 the applicant file that -- there was a
19 word for the form in the applicant file
20 that would list, you know, anyone who had
21 taken an interest in the applicant, for
22 example.

23 A. The Cornell review file --
24 or the Cornell Connection Review form, I

1 think, is what you're referring to.

2 Q. Yes.

3 A. And I would just want to
4 clarify that anyone's name on it was
5 from -- within the university who might
6 have an interest in the -- in the
7 student.

8 Q. Would it include the
9 information in the comments here on the
10 watch list?

11 A. I don't recall.

12 Q. Is it possible that it would
13 include that information?

14 A. It could. It could say that
15 a family was generous to the university,
16 giving of their time. It could be -- it
17 could mention a number of things.

18 MR. DELICH: You can go
19 ahead and take that down.

20 If we can go to Tab 51,
21 which we'll mark Exhibit 27.

22 (Document marked for
23 identification as Locke
24 Exhibit 27.)